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June 25, 1992 Federal Communications Commission
Office of the Secretary

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

92-90 /

RE: In the Matter of The Telephone Consumer Protection Act of 1991

Dear Ms. Searcy,

Attached are the original and five copies of the Reply Comments of Sprint Corporation in the proceeding referenced above.

Sincerely,

Jay C. Keithley
Vice President
Law and External Affairs

Attachments

JCK/mlm

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JUN 25 1992

Federal Communications Commission
Office of the Secretary

REPLY COMMENTS OF SPRINT

1. In the Matter of The Telephone Consumer Protection Act of 1991, Notice of Proposed Rulemaking, CC Docket No. 92-90, April 17, 1992 ("NPRM").

**I. ITN's Proposal To Query All Telemarketing
Calls Against a LIDB Database Is
Incomplete and Unreasonable**

ITN proposes that each telemarketing company "be required to pre-screen each customer's line number (prior to making a telephone solicitation) against a line information database to determine whether that customer accepts or rejects commercial telephone solicitations."² ITN claims this would require "some minimal data entry by the LIDB operators, but little if any alteration of the existing LIDB software."³ Some "additional equipment may be necessary to satisfy capacity requirements."⁴ Access to LIDB query capability would be via X.25 "links" from "personal computer or other computer-based predictive or auto-dialers used by the telemarketing industry"⁵ to the LEC SS7 supported LIDB. Protocol conversion from X.25 to SS7 would be performed by the LIDB provider.

ITN estimates the cost of the X.25 link at about \$10,000 per year⁶ per telemarketer. This cost would be paid by "the telemarketer who wishes to utilize the telephone system to conduct

2. ITN Comments at 3.

3. Id. at 4.

4. Id. at 4.

5. Id.

6. Id. at 7.

commercial solicitations."⁷ ITN apparently assumes that commercial enterprises that use telemarketing can easily absorb this link charge. In addition, a per query charge of \$.06 and personal computer or other devices that have X.25 ports would be required.

Many businesses that utilize telemarketing do not use predictive dialers or personal computers. For instance, a local carpet cleaning company often uses a paper list, dials with the human hand the appropriate number, and calls the potential customer by name. These operations, and there are multitudes of them, are small, localized, and technologically unsophisticated. X.25 links hooked to PCs and other devices are not part of their routine business. Adding PCs or autodialers at several thousand dollars a machine, X.25 links at \$10,000 each, and a \$.06 per query charge may put small businesses that utilize telemarketing out of business. This disparate impact upon small business is sufficient reason to justify rejection of the ITN proposal.

Additionally, while LIDB database capabilities may be modified to accommodate telemarketing "do not call" queries, the actual software development for this application has not, to Sprint's knowledge, yet been developed. Thus, this application, while theoretically possible, is not available at this time.

7. Id.

Further, X.25 protocol conversion is used by ITN, GTE and SNET, the three LIDB hub providers, but is not available at the other LEC LIDB databases. Thus, in order to obtain protocol conversion, a telemarketer would be forced to route all of its telemarketing queries through one of the three hub providers, that perform X.25 conversion to SS7.

ITN also ignores the additional costs to LECs that will arise from creation of "do not call" databases. No method of obtaining the initial database is proposed. No method of obtaining updates from the customer is proposed. These are significant problems that carry with them significant costs. For instance, the LIDB database on credit card accounts is updated from daily LEC service order and billing systems. This process is integrated and depends on multiple interdependent software programs. These programs and systems are neither designed for nor currently capable of handling "do not call" database entries. Significant development expenses would result. ITN downplays these significant LEC expenses.

Because the ITN plan favors large telemarketing firms, disadvantages small telemarketers, proposes the use of systems that are not yet developed, and ignores other significant costs, it should be rejected. As Sprint showed in its initial comments, each telemarketer should self police rather than bear the high

costs of an unneeded and unwarranted nationwide "do not call" database such as ITN proposes.

**II. A National "Do Not Call" Database
As Proposed by Lejeune Associates Is
Impractical and Imposes Excessive Costs
on Telemarketers**

Lejeune Associates of Florida ("Lejeune") support the creation of a national "do not call" database. Lejeune is a hardware and software supplier of systems used in management of telemarketing operators. Lejeune also indicates that it is interested in being the contractor for any telemarketing funded "do not call" database.⁸

Many problems with a national database have been discussed in the initial comments submitted to the Commission. In addition to these general comments, the Commission must realize that the plan Lejeune proposes is seriously flawed because it will not produce an accurate nationwide database.

Lejeune suggests that creation of a "do not call" database is simple. All it takes is some administrative body accepting "orders" to be placed in the database, and a check that the account is a residential customer. This check is performed "instantly" via some unidentified technology.⁹

8. Lejeune Comments at 20.

9. Id. at 22-23.

A fundamental flaw exists in this proposal. In the United Telephone companies 25 percent of the customer base churns each year.¹⁰ Sprint believes this percentage could be even higher for the industry in general. In order to meet the need for telephone numbers for new installs, the telephone numbers of terminated accounts are reassigned. No provision to remove reassigned accounts from the nationwide database exists in the Lejeune proposal.

In order to keep the database that Lejeune contemplates current, LECs would need to provide a list of all disconnects to the database administrator. This would be a problem for both LECs and the administrator and would add significant costs and capacity problems.

Additionally, the Lejeune proposal would place significant hardware and software costs, as well as database purchase costs, on businesses using telemarketing. While large firms may be able to absorb these costs, small firms that use telemarketing to supplement their other local marketing efforts may be financially precluded from using telemarketing because of the up front capital required to implement the Lejeune proposal.

10. The United Telephone companies have slightly more than four million access lines. In 1991 over one million lines were installed and over 900,000 lines were disconnected.

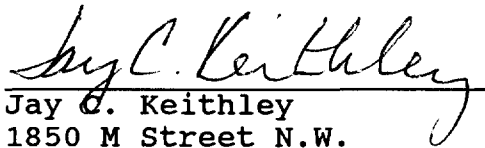
Because of the discriminatory impact on small business using telemarketing and the problems with database updates the Lejeune proposal for a national database should be rejected.

Conclusion

Nothing in the Comments to the NPRM justifies the creation of a nationwide "do not call" database. The Commission did not propose the creation of such a database when it issued the proposed Rules in the NPRM. The Commission should continue to reject the creation of such a database. The proposals of ITN and Lejeune are seriously flawed and should not be implemented.

Respectfully submitted,

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I, Melinda L. Mills, hereby certify that I have on this 25th day of June, 1992, sent via hand delivery a copy of the foregoing "Reply Comments of Sprint Corporation" CC Docket No. 92-90, In the Matter of The Telephone Consumer Protection Act of 1991, filed this date with the Secretary, Federal Communications Commission, to the persons listed below.


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